

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING FTX RECOVERY TRUST'S ONE HUNDRED FIFTY-FIRST
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN DUPLICATE
PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the one hundred fifty-first omnibus objection (the “Objection”)² of the FTX Recovery Trust³, for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Duplicate Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

³ The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ (as defined below) confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

§§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Duplicate Claim set forth in Schedule 1 and Schedule 2 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 and Schedule 2 attached hereto shall remain on the claims register, subject to (a) the FTX Recovery Trust’s further objections on any substantive or non-substantive grounds and (b) any order with respect to any prior or subsequent objection to the “Surviving Claims” identified on Schedule 1 and Schedule 2 attached hereto.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Duplicate Claims referenced or identified in the Objection that is not listed on Schedule 1 and Schedule 2 attached hereto.

4. Should one or more of the grounds of objection stated in the Objection be dismissed, the FTX Recovery Trust's right to object on any other grounds that the FTX Recovery Trust discovers is preserved.

5. To the extent a response is filed regarding any Duplicate Claim, each such Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the FTX Recovery Trust may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the FTX Recovery Trust pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors or the FTX Recovery Trust under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the FTX Recovery Trust's or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim

is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the FTX Recovery Trust; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

SCHEDULE 1

Duplicate Portal Claims

FTX Trading Ltd. 22-11068 (JTD)
One Hundred Fifty-First Omnibus Claims Objection
Schedule 1 - Substantive Duplicate Claims

[illegible]

203987: Running claim was ordered modified on the FTX Recovery Trust's One Hundred Twenty-Second [Substantive] Omnibus Objection to Certain Fully or Partially Unliquidated Proofs of Claim [Customer Claims]
203927: Running claim was ordered modified on the FTX Recovery Trust's One Hundred Twelfth [Substantive] Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim [Customer Claims]
548687: Running claim was ordered modified on the FTX Recovery Trust's One Hundred Eleventh [Substantive] Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim [Customer Claims]
230171: Running claim was ordered modified on the FTX Recovery Trust's Ninety Third [Non-Substantive] Omnibus Objection to Certain Insured Debtor Proofs of Claim [Customer Claims]

[illegible]

82297: Surviving Claim is pending modification on the FTS Recovery Trust's One Hundred Twenty-Fifth (Subsidiary); Creditors Objection to Certain Fully or Partially Unpaid Claims of Claim (Customer Claims)

82298: Surviving Claim was ordered modified on the FTS Recovery Trust's One Hundred Twenty-Fifth (Subsidiary); Creditors Objection to Certain Fully Unpaid Claims of Claim (Customer Claims)

82299: Surviving Claim was ordered modified on the FTS Recovery Trust's One Hundredth (Non-Subsidiary); Creditors Objection to Certain Incurred Debt Proofs of Claim (Customer Claims)

82300: Surviving Claim was ordered modified on the FTS Recovery Trust's Fiftieth (Non-Subsidiary); Creditors Objection to Certain Incurred Debt Proofs of Claim (Customer Claims)

Undetermined: Indicates claim contains unpaid and/or undetermined amounts

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
					SAND SOL UNI USDC USDY 100.00000000000000 8.651307720000000 51.373386460000000 155.406054000000000 0.005913000000000				
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98401	Name on file	West Realm Shires Services Inc.	USDC	30,274.4400000000000000	32892*	Name on file	West Realm Shires Services Inc.	USDC	10,274.4440000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the FTX Recovery Trust's One Hundred Twenty-Fifth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims).									
97463	Name on file	West Realm Shires Services Inc.	USD	225,000.0000000000000000	51419*	Name on file	West Realm Shires Services Inc.		
					AAVE BAT BIZ BTC CUSTG DOGE ETH ETHW GRT LINK LTC MATIC MKR SOL SUSHI TRX UNI USD USDY 2.454241970000000 0.020189040000000 5.049036400000000 0.000000000000000 15.000000000000000 18.874497830000000 0.000000006214749 15.526653736214749 730.825627280000000 25.689151170000000 7.082369260000000 715.207350700000000 0.205080770000000 254.245734700000000 0.000736640000000 19.680.148488585000000 39.365320310000000 101,770.184984607000000 7.222821950000000				
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's Twelfth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims).									
98290	Name on file	FTX Trading Ltd.	LUNA2 SRM	0.4592378477000000 3,749.243595028701124	44529	Name on file	FTX Trading Ltd.		
					ADA-PERP AMPL AMPL-PERP ATOM-PERP BOXA-PERP BULL CHX CREAM-PERP DENT DFL DMG DOGE DOGE-PERP ETH ETHBULL FIT HUM KSO5 KSO5-PERP LDOS-PERP LUNA2 LUNA2_LOCKED LUNC-PERP PEOPLE PEOPLE-PERP PSY SHIB SHIB-PERP SOL SOL-PERP SPELL SRM SRM_LOCKED SRM-PERP SNP USD USDY 0.000000000000000 0.000000000091935 0.000000000000000 0.000000000000000 0.000000000000000 0.000000000000000 0.000000008016000 0.000000000000000 0.000000006198731 0.000000009212682 36,000.096460000000000 0.000000006375000 0.000000000000000 0.000000003079129 0.000000005948142 0.000000009988987 0.000000005160988 0.000000009200000 0.000000000000000 0.000000000000000 0.459237847700000 0.071554978000000 0.000000000000000 0.000000005761856 0.000000000000000 0.000000003574000 0.000000001156960 0.000000000000000 0.000000008229600 0.000000000000000 0.000000001152762 3,749.243539502870000 19.827436050000000 0.000000000000000 0.000000004065378 0.027118489936402 0.000000009716060				
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98485	Name on file	FTX Trading Ltd.	FDC Other Crypto Assertions: HNT [0.4999]LLUNA2_LOCKED [0.1303785477]LUNC [0.18]SAND [0.9998]GENE [2.2996]GGG [39.992]USD [0.988895]LLUNA2 [0.0058762046]	79770*	Name on file	FTX Trading Ltd.			
					GENE GGG HNT LUNA2 LUNA2_LOCKED LUNC SAND USD USDY 2.299600000000000 39.992000000000000 0.499990000000000 0.055876204600000 0.130378547700000 0.180000000000000 0.999890000000000 0.988895000000000				
Reason: This claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's Fourth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).									

SCHEDULE 2

Duplicate Portal Claims

FTX Trading Ltd. 22-11068 (JTD)
One Hundred Fifty-First Omnibus Claims Objections
Schedule 2 - Substantive Duplicate Claims

[illegible][illegible]

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
						SRM			68.84540760000000
						SRM_LOCKED			329.48807100000000
						SRM-PERP			0.00000000000000
						SUSH-PERP			0.00000000000000
						SOP-PERP			0.00000000000000
						TOMCO-PERP			0.00000000000000
						TRX			0.00019100000000
						UNI-PERP			0.00000000000000
						USD			28,869.615457000000
						USDOT			0.2723213476682887
						VETI-PERP			0.00000000000000
						WAVES-PERP			0.00000000000000
						XLM-PERP			0.00000000000000
						XMR-PERP			0.00000000000000
						XRP-PERP			0.00000000000000
						XTZ-PERP			0.00000000000000
						YFI-PERP			0.00000000000000
						ZRX-PERP			0.00000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98730	Name on file	FTX Trading Ltd.		Undetermined*	72102	Name on file	FTX Trading Ltd.	BCH ETH ETHW FTT SRM SRM_LOCKED USD	1.1965763200000000 4.1880717700000000 3.3854300700000000 50.0000000000000000 1.4761794100000000 23.0038205900000000 2.89000178693079
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98580	Name on file	FTX Trading Ltd.	BTC ETH FTM FTT MATIC SRM USD	2.0776293100000000 377.1427096700000000 244.1853266100000000 500.1919404000000000 453.380366664140000000 171.7953064000000000 266.478.78000000000000	34501	Name on file	FTX Trading Ltd.	BTC ETH ETHW FTT FTM MATIC SRM SRM_LOCKED USD	2.0776293100000000 377.1427096700000000 0.0010270800000000 244.1831346000000000 500.1919404000000000 453.3803666600000000 21.7953560200000000 171.7953064000000000 266.478.77870000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98550	Name on file	FTX Trading Ltd.	USD	1.988.1400000000000000	32322	Name on file	West Realm Shires Services Inc.	BTC USD	0.0000598000000000 1.988.5000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98758	Name on file	West Realm Shires Services Inc.	USDC	101.390.02000000000000	91332*	Name on file	West Realm Shires Services Inc.	ETHW USD	0.1080820400000000 76.390.01592320000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's Thirty-Sixth (Substantive) Omnibus Objection to Certain Overstated and/or Partially Unliquidated Proofs of Claim (Customer Claims).									
98794	Name on file	FTX Trading Ltd.	USD	1.500.0000000000000000	44704*	Name on file	West Realm Shires Services Inc.	LINK USD	19.6000000000000000 1.126.3210189200000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's One Hundred Thirty-Fifth (Substantive) Omnibus Objection to Certain Fully Unliquidated Proofs of Claim (Customer Claims).									
98606	Name on file	FTX Trading Ltd.		Undetermined*	65028	Name on file	FTX Trading Ltd.	ATLAS CONV COT FTT LOOKS LUNA2 LUNA2_LOCKED LUNC MNGO MIB RAY SRM SRM_LOCKED TRX USD USDOT	10.489.46834200000000 7.378.66791000000000 819.9571113000000000 0.0472173800000000 104.9806485000000000 0.0316952409600000 0.0739555622300000 6.901.70544918656650 1.019.94043500000000 390.4766300000000000 659.0503661000000000 647.0612174300000000 11.4451484600000000 0.0000000000000000 0.079780833953188 0.036743295966120
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98608	Name on file	FTX Trading Ltd.		Undetermined*	65028	Name on file	FTX Trading Ltd.	ATLAS CONV COT FTT LOOKS LUNA2 LUNA2_LOCKED LUNC MNGO MIB RAY SRM SRM_LOCKED TRX USD USDOT	10.489.46834200000000 7.378.66791000000000 819.9571113000000000 0.0472173800000000 104.9806485000000000 0.0316952409600000 0.0739555622300000 6.901.70544918656650 1.019.94043500000000 390.4766300000000000 659.0503661000000000 647.0612174300000000 11.4451484600000000 0.0000000000000000 0.079780833953188 0.036743295966120
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98610	Name on file	FTX Trading Ltd.	ATLAS CONV POC Other Crypto Assertions: COVALENT POC Other Crypto Assertions: LOOKSRARE POC Other Crypto Assertions: MANGO PROTOCOL RAY SRM	10.4890000000000000 7.3786600000000000 81,995.00000000000000 10,498.00000000000000 1.0199400000000000 659,050.000000000000 647,061.000000000000	65028	Name on file	FTX Trading Ltd.	ATLAS CONV COT FTT LOOKS LUNA2 LUNA2_LOCKED LUNC MNGO MIB RAY SRM SRM_LOCKED TRX USD USDOT	10.489.46834200000000 7.378.66791000000000 819.9571113000000000 0.0472173800000000 104.9806485000000000 0.0316952409600000 0.0739555622300000 6.901.70544918656650 1.019.94043500000000 390.4766300000000000 659.0503661000000000 647.0612174300000000 11.4451484600000000 0.0000000000000000 0.079780833953188 0.036743295966120
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98621	Name on file	FTX Trading Ltd.	BTC ETH FTM FTT RAY RUNE SRM		89958	Name on file	FTX Trading Ltd.	BTC ETH FTM FTT GBP RAY RUNE SRM SRM_LOCKED USD	0.000000007188610 0.000000006709320 3,160.90265498387500 150.08814817865770 0.00000000784724 -0.406774382537906 0.00000000875330 0.2616470200000000 1.2057827600000000 -0.000000008148728
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98696	Name on file	FTX EU Ltd.	LTC MATIC USD	0.4104400000000000 71.2127400000000000 107.0900000000000000	64825*	Name on file	FTX Trading Ltd.	BNB BTC ETH ETHW EUR LTC MATIC USD USDOT	0.0000000100000000 0.0000000000420500 0.0000000000810880 0.00000000004810880 0.000000000471956 0.0104310000000000 72.1327460492496020 107.68730305371500 0.002965041757833
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's Fiftieth (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor (Customer Claims).									
98687	Name on file	FTX Trading Ltd.		Undetermined*	23358*	Name on file	FTX Trading Ltd.	BTC ETH ETHW	0.4903012560000000 2.5850458700000000 2.5850458700000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's One Hundred Thirty-Fifth (Substantive) Omnibus Objection to Certain Fully Unliquidated Proofs of Claim (Customer Claims).									
98741	Name on file	FTX Trading Ltd.	ETH FTT USDOT	0.0220000000000000 47.8090000000000000 281.5400000000000000	38677	Name on file	FTX Trading Ltd.	BNB ETH FTT USD USDOT	0.0065135100000000 0.0220063800000000 47.8091973200000000 0.0100000000000000 281.5400000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98563	Name on file	FTX Trading Ltd.	EUR JPY USD	197,914.00000000000000 1,429.9000000000000000 11,644.074.000000000000	73964	Name on file	FTX Trading Ltd.	EUR JPY USD USDOT	1,979.1449781100000000 1,429.9004616100000000 114,540.7447687805000000 20,311.5546473900000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
98473	Name on file	FTX Trading Ltd.	POC Other Fiat Assertions: CANT REMEMBER MY HOLDINGS USD	0.7300000000000000 100.0000000000000000 5,741.4290000000000000	34092*	Name on file	West Realm Shires Services Inc.	CUSDOT DOGE LINK LTC SOL TRX USD	1.0000000000000000 1.0000000000000000 72.0674000000000000 6.7537000000000000 17.4246500000000000 1.0000000000000000 514.9600000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's One Hundred Ninth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims).									
98723	Name on file	FTX EU Ltd.		Undetermined*	15501*	Name on file	FTX Trading Ltd.	ADABULL ETHBULL FTT MATIC RAY SOL	5.0000000000000000 5.0000000000000000 2.0000000000000000 10.0000000000000000 6.0000000000000000 5.0000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's Fiftieth (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor (Customer Claims).									
98666	Name on file	FTX Trading Ltd.	AVAX ETH SOL	0.0000515900000000 3.1480957000000000 0.0002953200000000	34327*	Name on file	West Realm Shires Services Inc.	AVAX DOGE ETH SHIB SOL TRX	0.0000515900000000 4.0000000000000000 3.1480957000000000 17.0000000000000000 0.0002953200000000 3.0000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's Seventy-Third (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor (Customer Claims).									
98798	Name on file	FTX Trading Ltd.	USD	7,698.75749918910000	37553*	Name on file	FTX Trading Ltd.	EUR TON/CONV-PERP TRX USD USDOT	0.6657408000000000 0.0000000000000000 0.0000010000000000 7,698.75749918910000 0.04049000335997
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's One Hundred Ninth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims).									
98786	Name on file	Quoine Pte Ltd	ETH SGD	0.7300000000000000 1.0000000000000000 7,052.3300000000000000	35048*	Name on file	Quoine Pte Ltd	BTC ETH SGD USD	0.7300000000000000 1.0000000000000000 7,052.3300000000000000 5,741.4290000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the FTX Recovery Trust's Fifty-Eighth (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor (Customer Claims).									

9837 Reasoning claim was entered modified on the FTX Recovery Trust's Twenty-Third (Non-Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

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